IN THE

Supreme Court of the United States

OCTOBER TERM, 1959

No. 575

THE FIRST NATIONAL CITY BANK OF NEW YORK,
Petitioner,

vs.

INTERNAL REVENUE SERVICE OF THE UNITED STATES TREASURY DEPARTMENT,
Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE SECOND CIRCUIT

MEMORANDUM IN BEHALF OF THE CHASE MANHATTAN BANK, AS *AMICUS CURIAE*, IN SUPPORT OF PETITION

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Attorney for
The Chase Manhattan Bank
as amicus curiae

January 20, 1960

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The Chase Manhattan Bank, like The First National City Bank of New York, petitioner, operates numerous branches outside the territorial limits of the United States, including branches in the Republic of Panama. It has examined the petition for certiorari herein and believes that the questions raised in this proceeding are important to it and to all other American banks, National or State, operating foreign branches outside the territorial limits of the United States. It submits that the manner in which those questions are resolved

will affect importantly future operations of such branches and transactions involving the foreign trade of the United States. The decision below, if allowed to stand, would hamper such operations and transactions. Accordingly, that decision should be reviewed by this Court and the law with respect to the questions involved should be settled here.

It is respectfully urged that the petition be granted.

Respectfully submitted,

A. DONALD MACKINNON,
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January 20, 1960